



## OPERATIONAL MEMO

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<b>TITLE:</b>	<b>UPDATED: CHANGES TO BENEFITS AND SERVICES IN RESPONSE TO COVID-19</b>
<b>SUPERSEDES NUMBER:</b>	<b>HCPF OM 20-024</b>
<b>EFFECTIVE DATE:</b>	<b>MARCH 24, 2020</b>
<b>DIVISION AND OFFICE:</b>	<b>BENEFITS AND SERVICES MANAGEMENT DIVISION, OFFICE OF COMMUNITY LIVING</b>
<b>PROGRAM AREA:</b>	<b>CASE MANAGEMENT AND PROVIDER AGENCIES</b>
<b>KEY WORDS:</b>	<b>COVID-19, CORONAVIRUS, BENEFITS AND SERVICES, HOME AND COMMUNITY BASED SERVICES, CDASS, CASE MANAGEMENT</b>
<b>OPERATIONAL MEMO NUMBER: HCPF OM 20-046</b>	
<b>ISSUE DATE: APRIL 23, 2020</b>	
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*HCPF Memo Series can be accessed online: <https://www.colorado.gov/hcpf/memo-series>*

### **Purpose and Audience:**

The purpose of this Operational Memo is to inform Providers and Case Management Agencies of additional temporary changes in response to COVID-19 pandemic to Home and Community-Based Services (HCBS) waiver benefits and services offered through Health First Colorado. The updates and changes are in **bold** in the chart below.

The Department of Health Care Policy & Financing (the Department) is requiring all HCBS waiver providers to modify operations in response to health concerns related to the COVID-19 pandemic.

Providers shall modify their operations to follow the most recent guidance from the [Centers for Disease Control \(CDC\)](#), the [Colorado Department of Public Health and Environment \(CDPHE\)](#) and the [President's Coronavirus Guidelines for America](#).

### **Information:**

The Department is working with the federal Centers for Medicare & Medicaid Services to make temporary changes to selected State General Fund and Home and Community-

Based Services programs to better ensure continuity of services and to mitigate the public health risk in response to the COVID-19 illness. To prevent the spread of COVID-19, the Department is implementing temporary provisions to prohibit services from being provided in group settings and allow for flexibility in the delivery of services.

Below is information on the services modified, the temporary allowable provisions, and the action needed from case management agencies and providers. Temporary modifications include but are not limited to virtual visits and alternative service locations.

At no time shall the delivery of community-based services include more than ten people, to include support staff. At all times, support staff shall ensure social distancing recommendations of at least 6 feet are followed. Services shall be provided via use of technology or in 1:1 settings wherever possible.

Prior to providing in person services, providers should conduct limited health screening of members and staff. Screening should include taking a member's temperature. Any reading 100 degrees or higher should be considered a failed screen and the member should contact their physician for further guidance.

If a staff or member are coughing or otherwise visibly ill, they should be separated from others and have a mask put on, prior to seeking medical attention.

Providers are encouraged to monitor the [CDC website](#) for information and resources and contact their [local health department](#) when needed. The Centers for Medicare & Medicaid Services (CMS) has issued guidance on infection control and prevention for Home Health entities. The Department requires all providers to follow this guidance. The formal guidance can be found on CMS' website [here](#).

Questions regarding this guidance can be sent to [HCPF\\_HCBS\\_Questions@state.co.us](mailto:HCPF_HCBS_Questions@state.co.us).



**Home and Community-Based Service Waiver and State Plan Benefits Temporary Changes  
 Effective March 24, 2020**

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
Alternative Care Facility (ACF)	ACF providers may modify visitor policies to home/ facility, modify community outings in alignment with published guidance on mitigating the spread of COVID-19.	No Changes Required	Providers must inform members and their families or authorized representatives (where applicable)
Acupuncture	No modifications needed currently, as service provision allows for flexibility in place of service. If congregate settings are being used for service provision to groups, the Department requires changes to provide service in alternate settings.	No Changes Required	No Changes Required
Adaptive Therapeutic Recreational Equipment and Fees	Adaptive and Therapeutic Recreational Equipment providers may utilize telephone or video conferencing or phone assessments for recommended items. The preferred method being live video sharing.	No Changes Required	Providers must document when telephone or video conferencing assessments are conducted.
Adult Day Centers	Adult Day Services may be provided in alternative locations, such as a member's home. Providers may also utilize telephone	The Case Manager will log note the suspension or	Providers are strongly encouraged to utilize other service delivery options as

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	<p>or video conferencing methods, where appropriate, to provide services.</p> <p>Adult Day Centers that have closed, suspended, or reduced services in response to COVID-19 may bill for retainer payments. Retainer payments must be documented by the case manager and not be billed when the member chooses to receive services through a different provider.</p>	<p>reduction of services and work with the member, or member designated contact, to identify potential changes needed to the service plan. Adult Day will remain on the PAR to allow for provider retention payments unless the member chooses to receive services through a different provider.</p>	<p>specified in the Service Modification section to maintain proper support for all members served. For further guidance on how to bill for retainer payments please refer to the informational memo published at:</p> <p><a href="#">HCPF OM 20-039</a></p>
Assistive Technology	<p>Assistive Technology providers may utilize telephone or video conferencing or phone assessments for recommended items. The preferred method being live video sharing.</p>	<p>No Changes Required</p>	<p>Providers must document when telephone or video conferencing assessments are conducted.</p>
Behavioral Management and Education	<p>Behavioral Management and Education providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative for this service requires the professional administering the service to use their professional judgement to determine</p>	<p>No Changes Required</p>	<p>Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan.</p>

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
	whether service integrity is maintained through a telephone or video conferencing delivery option and would be appropriate.		Providers must inform case managers of care plan changes.
Behavioral Therapies - Counseling/ Consultation/ Assessment	Behavioral Therapies-Counseling/ Consultation/ Assessment providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative for this service requires the professional administering the service to use their professional judgement to determine whether telephone or video conferencing service delivery aligns with positive therapeutic outcomes and treatment goals while maintaining service integrity.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
Behavioral Therapies - Line Staff	Behavioral Therapies-Line Staff providers may utilize telephone or video conferencing methods when rendering this service. The service provision alternative includes allowance of services via telephone or video conferencing when appropriate, when hand over hand implementation of behavior interventions is not required. The behavioral plan consultant must indicate in the members care plan that a telephone or	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.

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	video conferencing visit will align with positive therapeutic outcomes and treatment goals.		
Bereavement Counseling	Bereavement Counseling providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative for this service requires the professional administering the service to use their professional judgement to determine whether telephone or video conferencing service delivery aligns with positive therapeutic outcomes and treatment goals while maintaining service integrity.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member's family must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
Chiropractic	No modifications needed currently, as service provision allows for flexibility in place of service.	No Changes Required	
CHRP Residential	CHRP residential providers may modify visitor policies to home/ facility, modify community outings. Agencies and facilities must be in contact with the Colorado Department of Human Services, Division of Child Welfare Licensing to review modifications to services or programming	No Changes Required	Providers must communicate all changes in policies or restrictions on rights to residents and their guardians, if applicable, and document those changes and/or restrictions in the care plan. Providers must

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	that restricts the rights of children or that may result in non-compliance.		inform case managers of care plan changes.
CHRP Wraparound - Intensive Support Services	Wraparound-Intensive Support Services providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative for this service requires the professional administering the service to use their professional judgement to determine whether telephone or video conferencing service delivery aligns with positive therapeutic outcomes and treatment goals while maintaining service integrity.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
CHRP Wraparound - Transition Support Services	Wraparound-Transition Support Services providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative for this service requires the professional administering the service to use their professional judgement to determine whether telephone or video conferencing service delivery aligns with positive therapeutic outcomes and treatment goals while maintaining service integrity.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.

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<b>Community Connector</b>	Community Connector may be provided in the home with minimal community integration; legally responsible persons are allowed to provide this service. Providers may also utilize telephone or video conferencing methods, where appropriate, to provide services.	<b>Changes in the method of delivery or authorized direct care professional must remain within the current service plan authorized limits.</b>	Providers must document in the member's care plan that a legally responsible person is rendering the service
Consumer Directed Attendant Support Services (CDASS)	FMS Vendors have adjusted their hours to have someone available 7 days a week. The FMS' are ready to assist members with questions and will work to enroll new attendants within 24 hours should a member have an urgent need for a new attendant.	No Changes Required	Members will need to ensure appropriate documentation for any changes.
Day Treatment	<p>Day Treatment may be provided in alternative locations, such as a member's home. Providers may also utilize telephone or video conferencing methods, where appropriate, to provide services.</p> <p>Day Treatment providers that have closed, suspended or reduced services in response to COVID-19 may bill for retainer payments.</p>	The Case Manager will log note the suspension or reduction of services and work with the member, or member designated contact, to identify potential changes needed to the service plan. Day	Providers are strongly encouraged to utilize other service delivery options as specified in the Service Modification section to maintain proper support for all members served. For further guidance on how to bill for retainer payments please refer to the

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	Retainer payments must be documented by the case manager and not be billed when the member chooses to receive services through a different provider.	Treatment will remain on the PAR to allow for provider retention payments unless the member chooses to receive services through a different provider.	informational memo published at: <a href="#">HCPF IM 20-017 and HCPF OM 20-039</a>
Dental	No modifications appropriate/safe for this service.	No Changes Required	
Expressive Therapy	Expressive Therapy providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative for this service requires the professional administering the service to use their professional judgement to determine whether service integrity is maintained through telephone or video conferencing delivery and would align with positive therapeutic outcomes and treatment goals.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
Group Residential Services and Supports (GRSS)	GRSS providers may modify visitor policies to home/ facility, modify community outings in alignment with published guidance on mitigating the spread of COVID-19.	No Changes Required	Providers must inform members and their families or authorized representatives (where applicable)

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Hippotherapy	There are no service modifications for this service delivery.	No Changes Required	
Home Delivered Meals	No modifications for this service.	No Changes Required	
Home Modification and Adaptations	Home Modification and Adaptations providers may utilize telephone or video conferencing technology for professional evaluations, if the client has live video sharing capabilities with the professional.	No Changes Required	Providers must document when telephone or video conferencing assessments are conducted.
<b>Homemaker</b>	<b>Homemaker services may be provided by legally responsible persons/parents, family members, or spouses to reduce the risk of exposure to COVID-19.</b>	<b>Changes in the method of delivery or authorized direct care professional must remain within the current service plan authorized limits.</b>	<b>Providers must document in the member's care plan any changes in care delivery by a legally responsible person.</b>
In-Home Support Services (IHSS)	No modifications for this service delivery option.	No Changes Required	
Independent Living Skills Training (ILST)	ILST providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative would	No Changes Required	Providers that determine telephone or video conferencing visits can meet

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	allow the provider to use their best professional judgement to determine if a telephone or video conferencing visit would be beneficial and aligned with the member's goals.		the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
Individual Residential Services and Supports (IRSS)	IRSS providers may modify visitor policies to home/ facility, modify community outings, in alignment with published guidance on how to mitigate the spread of COVID-19.	No Changes Required	Providers must inform members and their families or authorized representatives (where applicable)
Life Skills Training (LST)	LST providers may utilize telephone or video conferencing or video conferencing methods when rendering this service. The provision alternative would allow the provider to use their best professional judgement to determine if a telephone or video conferencing or video conferencing visit would be beneficial and aligned with the member's goals.	No Changes Required	Providers that determine telephone or video conferencing or video conferencing visits can meet the needs of the member must document assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
Massage	No modifications needed currently, as service provision allows for flexibility in place of service.	No Changes Required	

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Medication Monitoring	No modifications appropriate for this service.	No Changes Required	
Mental Health Counseling	Mental Health Counseling providers may utilize telephone or video conferencing or video conferencing methods when rendering this service. The provision alternative for this service requires the professional administering the service to use their professional judgement to determine whether service integrity is maintained through a telephone or video conferencing or video conferencing delivery option and would be appropriate.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the members must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
Mentorship	Mentorship providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative for this service requires the provider administering the service to use their judgement to determine whether service integrity is maintained through a telephone or video conferencing delivery option and would be appropriate.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.

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Movement Therapy	Movement Therapy providers may utilize telephone or video conferencing methods when rendering this service. The provision alternative for this service requires the provider administering the service to use their professional judgement to determine whether service integrity is maintained through a telephone or video conferencing delivery option and would be appropriate.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
Non-Medical Transportation (NMT)	No modifications for this service.	No Changes Required	No Changes Required
Palliative Supportive Care	Palliative and Supportive Care providers may utilize telephone or video conferencing methods when rendering this service. Providers must use their best professional judgement to determine if a telephone or video conferencing visit would be beneficial and align with positive medical outcomes and treatment goals.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
Parent Education	No provisions appropriate for this service.	No Changes Required	

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Peer Mentorship	Peer Mentorship providers may utilize telephone or video conferencing methods when rendering this service. Providers must use their best professional judgement to determine if a telephone or video conferencing visit would be beneficial and align with positive outcomes and goals.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
Personal Emergency Response Systems (PERS)	No provisions appropriate/safe for this service.	No Changes Required	
<b>Personal Care</b>	<b>Personal Care services may be provided by a member's spouse to reduce the risk of exposure to COVID-19.</b>	<b>Changes in the method of delivery or authorized direct care professional must remain within the current service plan authorized limits.</b>	<b>Providers must document in the member's care plan any changes in service scope, method of delivery, or authorized direct care professional.</b>
Pre-Vocational Services	Pre-Vocational Services may be provided in alternative locations, such as a member's	The Case Manager will log note the	Providers are strongly encouraged to utilize other

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	<p>home. Providers may also utilize telephone or video conferencing methods, where appropriate, to provide services.</p> <p>Pre-Vocational providers that have closed, suspended, or reduced services in response to COVID-19 may bill for retainer payments. Retainer payments must be documented by the case manager and not be billed when the member chooses to receive services through a different provider.</p>	<p>suspension or reduction of services and work with the member, or member designated contact, to identify potential changes needed to the service plan. Pre-Vocational will remain on the PAR to allow for provider retention payments unless the member chooses to receive services through a different provider.</p>	<p>service delivery options as specified in the Service Modification section to maintain proper support for all members served. For further guidance on how to bill for retainer payments please refer to the informational memo published at: <a href="#">HCPF OM 20-039</a></p>
Respite	<p>Respite services will have flexibility in location of service which may include in the home or another setting as needed.</p>	<p>The case manager will log note any changes in service location.</p>	<p>Providers must document the change in location of service. The provider must inform case managers of the changes.</p>
Supported Living Program (SLP)	<p>Based on best practices and published guidance on mitigating the spread of COVID-19, the SLP providers may modify</p>	<p>No Changes Required</p>	<p>Providers must inform members and their families</p>

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	visitor policies to home/ facility, modify community outings.		or authorized representatives (where applicable)
Specialized Medical Equipment and Supplies (SMES)	No modifications for this service.	If additional services are needed by the member according to the requirements specified, the Case Manager will revise the members PAR and Service Plan to reflect the increased service level.	
<b>Specialized Habilitation-facility</b>	<p>Specialized Habilitation facility services may be provided in alternative locations such as a member’s home. Providers may also utilize telephone or video conferencing methods, where appropriate, to provide services.</p> <p>Specialized Habilitation providers that have closed, suspended, or reduced services in response to COVID-19 may bill for retainer payments. Retainer payments must be documented by the case manager and not be billed when the member chooses to</p>	<p>The Case Manager will log note the suspension or reduction of services and work with the member, or member designated contact, to identify potential changes needed to the service plan. Specialized habilitation will remain on the PAR to allow for provider</p>	<p>Providers are strongly encouraged to utilize other service delivery options as specified in the Service Modification section to maintain proper support for all members served. For further guidance on how to bill for retainer payments please refer to the informational memo published at:</p> <p><a href="#">HCPF OM 20-039</a></p>

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	receive services through a different provider.	retention payments unless the member chooses to receive services through a different provider.	
<b>Substance Use Counseling</b>	Substance Use Counseling providers may utilize telephone or video conferencing methods when rendering this service. Providers must use their best professional judgement to determine if a telephone or video conferencing visit would be beneficial and align with the member's goals.	No Changes Required	Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case managers of care plan changes.
<b>Supported Community Connections</b>	Supported Community Connections may be provided in the home or an alternative location, with minimal community integration. Providers may also utilize telephone or video conferencing methods, where appropriate, to provide services.  Providers of Supported Community that have closed, suspended, or reduced services	The Case Manager will log note the suspension or reduction of services and work with the member, or member designated contact, to identify potential changes needed to the service plan.	Providers are strongly encouraged to utilize other service delivery options as specified in the Service Modification section to maintain proper support for all members served. For further guidance on how to bill for retainer payments please refer to the

<b>Service</b>	<b>Description of Service Modification</b>	<b>Case Management Action Required</b>	<b>Funding Options/ Provider Changes</b>
	<p>in response to COVID-19 may bill for retainer payments. Retainer payments must be documented by the case manager and not be billed when the member chooses to receive services through a different provider.</p> <p><b>Supported Community Connector services may be provided by legally responsible persons/parents or relatives for the CHRP waiver to reduce the risk of exposure to COVID-19.</b></p>	<p>Supported Community Connections will remain on the PAR to allow for provider retention payments unless the member chooses to receive services through a different provider.</p> <p><b>Changes in the method of delivery or authorized direct care professional must remain within the current service plan authorized limits.</b></p>	<p>informational memo published at:  <a href="#">HCPF OM 20-039</a></p>
<p><b>Supported Employment</b></p>	<p>This service currently allows for flexibility in place of service. In addition, providers may also utilize telephone or video conferencing methods, where appropriate, to provide services. Providers must use their best professional judgement to determine if a telephone or video conferencing visit would be beneficial and</p>	<p><b>The Case Manager will log note the suspension or reduction of services and work with the member, or member designated contact, to identify potential changes</b></p>	<p>Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case</p>

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	<p>align with member's employment needs and goals.</p> <p><b>Supported Employment providers that have closed, suspended, or reduced services in response to COVID-19 may bill for retainer payments. Retainer payments must be documented by the case manager and not be billed when the member chooses to receive services through a different provider.</b></p>	<p><b>needed to the service plan. Supported Employment will remain on the PAR to allow for provider retention payments unless the member chooses to receive services through a different provider.</b></p>	<p>managers of care plan changes.</p> <p><b>Providers are strongly encouraged to utilize other service delivery options as specified in the Service Modification section to maintain proper support for all members served. For further guidance on how to bill for retainer payments please refer to the informational memo published at: <a href="#">HCPF OM 20-039</a></b></p>
<b>Therapeutic Life Limiting Illness Support</b>	<p>Therapeutic Life Limiting Illness Support providers may utilize telephone or video conferencing methods when rendering this service. Providers must use their best professional judgement to determine if a telephone or video conferencing visit would be beneficial and align with the member's therapeutic goals.</p>	<p>No Changes Required</p>	<p>Providers that determine telephone or video conferencing visits can meet the needs of the member must document the assessment and any concerns in the care plan. Providers must inform case</p>

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			managers of care plan changes.
<b>Transitional Living Program (TLP)</b>	TLP providers may modify visitor policies to home/ facility, modify community outings, in alignment with published guidance on how to mitigate the spread of COVID-19.	No Changes Required	Providers must inform members and their families or authorized representatives (where applicable)
<b>Transition Set Up and Coordination</b>	No provisions appropriate/safe for this service.	No Changes Required	
<b>Vehicle Modifications</b>	Vehicle Modification providers may utilize telephone or video conferencing technology for professional evaluations. The preferred method being live video sharing.	No Changes Required	Providers must document when telephone or video conferencing assessments are conducted.
<b>Vision</b>	No provisions appropriate/safe for this service.	No Changes Required	
<b>Youth Day</b>	No modifications for this service.	No Changes Required	



**COLORADO**  
Department of Health Care  
Policy & Financing

### **Additional References for this document & Resource Links**

- [Recommendations for Long-Term Care Facilities](#) (CDC)
- [Steps Healthcare Facilities Can Take Now to Prepare for Coronavirus Disease 2019 \(COVID-19\)](#) (CDC)
- [FAQS for Healthcare Providers Regarding Medicare Billing and Payment](#) (CMS)
- [Coronavirus Preparation and Response Toolkit](#) (Argentum)
- [Interim Health Care Infection Prevention and Control Recommendations for Patients Under Investigation for Coronavirus Disease 2019 \(COVID-19\)](#) (CDC)
- [Handwashing Video](#) (Ecolab)
- [Information Regarding COVID-19](#) AHCA/NCAL (American Health Care Association / National Center for Assisted Living)
- [Handwashing 101](#) (ServSafe)

Follow the [CDC website](#) to keep up with the general trends and what's happening. Communicating with your [state health department](#) and watching local news will help you with specifics.

### **Attachment(s):**

None

### **Department Contact:**

[HCPF\\_HCBS\\_Questions@state.co.us](mailto:HCPF_HCBS_Questions@state.co.us)

### **Department COVID-19 Webpage:**

<https://www.colorado.gov/pacific/hcpf/COVID>

For specific information, please call the CDPHE Call Center at 303-692-2700.

For general questions about COVID-19: Call CO-Help at 303-389-1687 or 1-877-462-2911 or email [COHELP@RMPDC.org](mailto:COHELP@RMPDC.org), for answers in English and Spanish (Español), Mandarin (普通话), and more.